

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C. 20554

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In the Matter of)
Amendment of the Commission's)
Rules to Permit the Licensing) RM-8623
of Mobile Operations on the)
Frequencies 154.570 MHz and)
154.600 MHz without Prior)
Frequency Coordination)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

TO: The Commission

COMMENTS OF
FOREST INDUSTRIES TELECOMMUNICATIONS

Forest Industries Telecommunications ("FIT")
respectfully submits its comments in response to the Petition for
Rulemaking filed by the Council of Independent Communication
Suppliers ("CICS").

I.

INTRODUCTION

FIT is the national organization of radio users
licensed in the Forest Products Radio Service. For more than 45
years, FIT has been recognized by the Commission as the Frequency
Coordinator for the Forest Products Radio Service. It is also
the forest product industry's representative for matters
pertaining to land mobile radio communications. FIT has nearly
2,000 members ranging in size from Fortune 500 companies such as
Weyerhaeuser and Georgia Pacific and to many small to medium-

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sized contract loggers and lumber and pulp and paper producing companies. The forest products industry, being one of the major, primary industries in America, provides building materials and paper products vital to the nation's needs.

Radio serves the forest products industry by enhancing the productivity and safety of hundreds of thousands of forest products employees. The two frequencies which are the subject of the CICS Petition, 154.570 MHz and 154.600 MHz, are an important part of the industry's communications infrastructure. Accordingly, FIT member companies have a vital stake in the issues raised by the Petition.

II.

DISCUSSION

FIT is strongly opposed to the CICS request on both procedural and substantive grounds.

A. THE PETITION IS PREMATURE.

Procedurally CICS' proposal should be dismissed as premature.

The Commission has been grappling nearly three years with the many complex issues surrounding re-farming of the private land mobile spectrum below 512 MHz. See Notice of Proposed Rulemaking in PR Docket No. 92-235, FCC 92-469, released November 6, 1992. After great expenditure of time and resources by industry and the Commission, the agency is nearing a point of decision regarding at least some of the issues raised in this proceeding. There is no point -- indeed it could be counter-

productive -- to attempt to carve these two frequencies out of all those below 512 MHz and treat them separately from the overall re-farming effort. Rather, FIT would urge the agency to dismiss the Petition without prejudice to its re-filing once the re-farming proceeding has been concluded. While new channelization might not change CICS' perception of the basis for its Petition, it will certainly have implications for the two discrete frequencies which are the subject of its filing.

If, despite the points made above, the agency were inclined to reach the merits of the Petition, FIT would urge its denial.

B. ON THE MERITS THE PETITION IS LIKEWISE DEFICIENT.

Substantively, the Petition is deficient for at least two reasons.

1. The Petition Overlooks The Important Quality Control Purposes Served by Frequency Coordination.

CICS' Petition is premised on the notion that coordination is unnecessary here due to the low-power and mobile nature of the operations which can be licensed on these frequencies. While this view is mistaken (for reasons articulated later), it also overlooks a separate purpose served by the frequency coordination process; namely, quality control for the hundreds of thousands of PLMRS applications filed with Gettysburg each year.

Pursuant to the Report and Order in PR Docket No. 83-737, frequency coordinators such as FIT were charged with the responsibility of ensuring that applications are complete and that the data on lines 1-25 on the Form 574 were correct. Id., 60 RR 2d 41, 48-49 (1986). That decision freed up scarce

Commission resources for other, more pressing tasks. According to the Commission the coordination program has been a success. See, e.g., Report to the Commission on Frequency Coordination in the Private Land Mobile Radio Services (November 17, 1988), at para. 13 (frequency coordination has improved "the overall quality of submitted applications" reducing the administrative burden on the Gettysburg staff as well as licensing delays). Eliminating the frequency coordination requirement for these frequencies would necessarily affect the quality of the applications received in Gettysburg: application returns would increase, licensing delays lengthen and Commission resources wasted.

This concern is underscored by the fact that industry and the Commission are in the midst of adjusting to the demands of the new Form 600. Frequency coordination is especially important in helping applicants cope with the new Form; it makes no sense to eliminate coordinator review of applications at the very time users and the Commission may need it most.

2. Frequency Coordination Has Adverse Implications for Worker Safety.

Frequency coordination has played, and continues to play, an important role in enhancing the safety of operations relying on shared radio channels. CICS' Petition would undermine this aspect of frequency coordination as well. A word of background may be in order here.

In the Forest Products Service, these two VHF frequencies are used almost exclusively for high lead logging control in the

woods, i.e. to enable a worker attaching cable slings to a group of logs (a "choker setter") to signal a remote winch operator (the "yarder operator") that the logs are ready for lifting.¹ It is because of their low power nature that these frequencies are effective for this remote signalling. In close cooperation with state Occupational Safety Offices in the Pacific Northwest, system-tones are assigned and coordinated so that loggers may use only specific systems in defined geographic areas. This State/FIT cooperation keeps intra-Radio Service, inter-system interference to a minimum and, in the event of interference, allows quick identification of the potential violator.² And make no mistake about it -- interference can have lethal consequences.

Take, for example, two systems operating on ridge tops a few miles apart, but with line of sight.³ If a "GO" signal from logger A on one ridge were received as a "GO" by yarder operator B on the other ridge, yarder operator B would be prompted to activate his winching system before his own crew was clear of the cables and logs. This could easily result in death or serious

¹ See the attachment for an illustration of a typical "high lead" logging operation and the terms used here.

² Assignment of system codes is generally made so as to avoid code duplication within a defined geographic area such as specifically identified counties or forests. However, the nature of the logging business is such that operators frequently move from one area to another; hence, reliance on only tone-code coordination is not sufficient; frequency coordination is also necessary.

³ Since line of sight conditions can exist, the two watt power limitation is not sufficient by itself to control interference.

injury to the crew. Licensing coordination and system-tone coordination reduces the risk of this scenario by keeping two systems on identical frequencies with identical tones from operating in the same geographical area.

The Petition argues that users of these frequencies do not receive any additional protection as a result of coordination because of the mobile nature of the operations, i.e. "the interference potential, to the extent it may exist, will be random and unpredictable." Id. at 4. Not so.

FIT, for its part, typically coordinates applications for these frequencies on a mileage-radius basis with a specific set of coordinates assigned to each user. In so doing FIT is able to minimize the risk of interference between and among forest products companies -- the kind of interference which is the most dangerous due to the use of tone codes by these companies. If the Commission were to eliminate frequency coordination, it would make more difficult the task of maintaining a database showing each licensee's area of operation, a database which can be vital in identifying a source of interference if it should occur; and it would increase the risk that a new user might be coordinated close to, or even on top of, another user.⁴

⁴ The Petition's reliance on the mobile licensing of these frequencies as grounds for its request is without merit for another reason as well. Forest Products, Railroad, Special Industrial and Manufacturers users share 10 low-power frequencies in the 72-76 MHz band. The Commission determined to require coordination of these frequencies notwithstanding the fact that they are licensed for mobile-only use. See Memorandum Opinion and Order in PR Docket No. 83-737, 61 RR 2d 148, 157-58 (1986).

III.

CONCLUSION

Eliminating coordination for those frequencies would be a step backward for sound spectrum management, and would mean additional hazards to the safety of men and equipment in the forest products industry. Accordingly, FIT strongly opposes the Petition; it should be denied, if not dismissed.

Respectfully submitted,

A handwritten signature in cursive script, reading "Kenton E. Sturdevant". The signature is written in dark ink and is positioned above the printed name and title.

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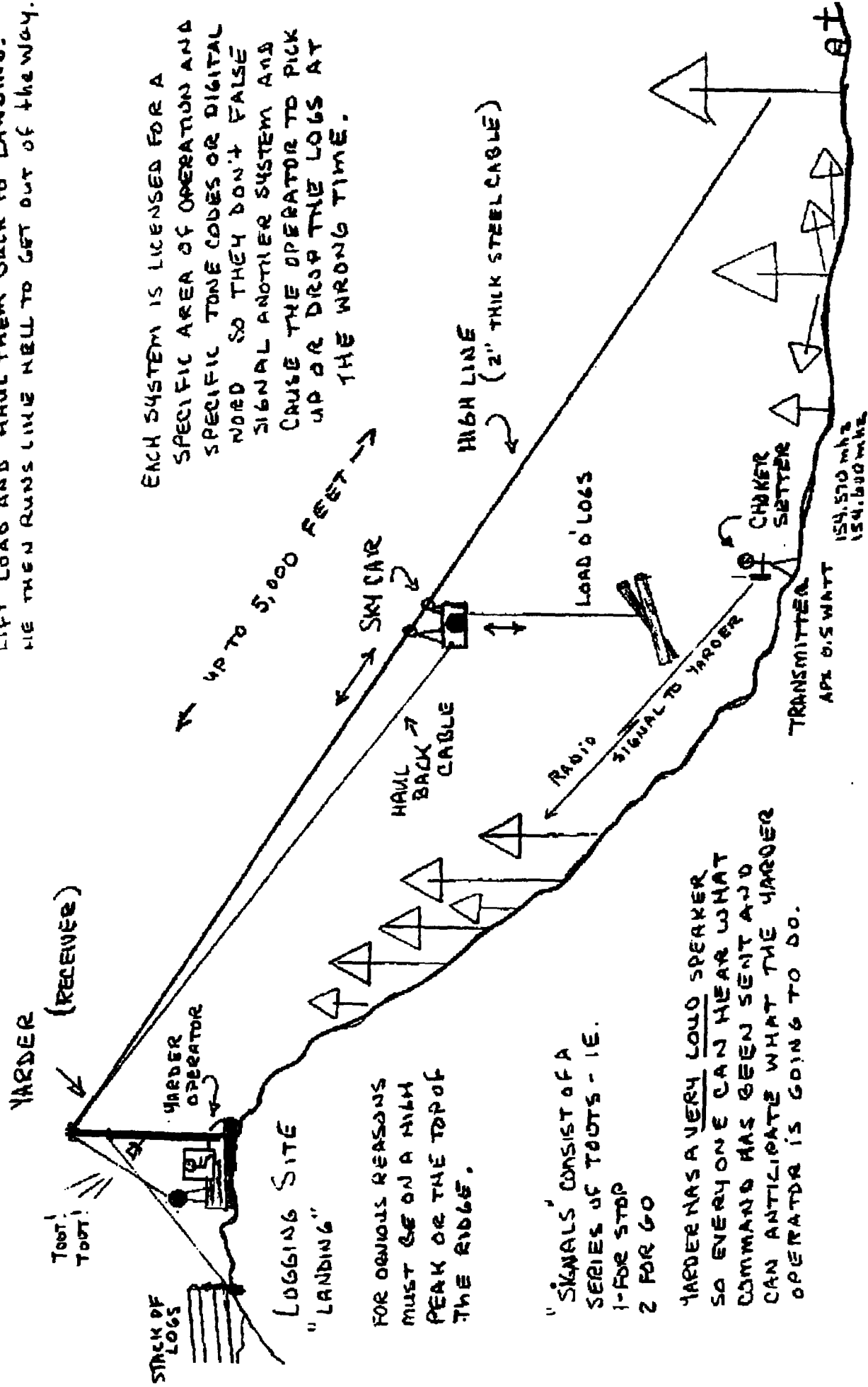


YARDEE - Big Winch AT LANDING - HAULS THE SKY CAR BACK & FRO

SKY CAR - RIDES THE HIGH LINE. ALSO HAS SPOOLS OF CABLE TO HOIST LOAD UP ABOVE TREE LINE. SOMETIMES THE SPOOLS ARE RADIO CONTROLLED.

CHOKER SETTER. ATTACHES LOGS TO CABLES FROM SKY CAR THEN Toots (via radio) to YARDEE OPERATOR TO LIFT LOAD AND HAUL THEM BACK TO LANDING. HE THEN RUNS LINE HELD TO GET OUT OF THE WAY.

EACH SYSTEM IS LICENSED FOR A SPECIFIC AREA OF OPERATION AND SPECIFIC TONE CODES OR DIGITAL WORDS SO THEY DON'T FALSE SIGNAL ANOTHER SYSTEM AND CAUSE THE OPERATOR TO PICK UP OR DROP THE LOGS AT THE WRONG TIME.



FOR OBVIOUS REASONS MUST BE ON A HIGH PEAK OR THE TOP OF THE RIDGE.

"SIGNALS" CONSIST OF A SERIES OF Toots - I.E.
1- FOR STOP
2- FOR GO

YARDEE HAS A VERY LOUD SPEAKER SO EVERYONE CAN HEAR WHAT COMMAND HAS BEEN SENT AND CAN ANTICIPATE WHAT THE YARDEE OPERATOR IS GOING TO DO.

HIGH LINE (2" THICK STEEL CABLE)

CHOKER SETTER

TRANSMITTER

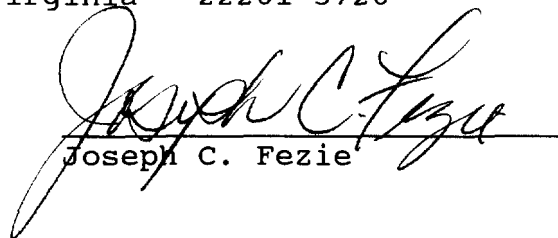
APX 0.5 WATT

154.570 mhz
154.600 mhz

CERTIFICATE OF SERVICE

I, Joseph C. Fezie, hereby certify that true copies of the foregoing "Comments of Forest Industries Telecommunications" have been sent by first-class United States mail, postage prepaid, this 26th day of April, 1995.

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